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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

VIRGINIA GUEVARA,) Civil No. 1:22-cv-00490-BAK (EPG)
Plaintiff,)
v.) STIPULATION AND ORDER FOR
Acting Commissioner of Social Security,) EXTENSION OF TIME TO RESPOND
Defendant.) TO PLAINTIFF'S COMPLAINT
(ECF No. 11)

The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security (the “Commissioner”), shall have an extension of time to respond to Plaintiff’s Complaint in this case. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due July 25, 2022. Defendant has not previously requested an extension of this deadline.

2. The certified administrative record (CAR) in this case has not been finalized for filing.

The agency's Office of Appellate Operations (OAO) is responsible for preparation of CARs. Counsel for the Commissioner is in contact with OAO to ensure that the CAR is properly certified for filing. Accordingly, Defendant requests an extension of 60 days to respond to Plaintiff's Complaint.

3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that he has no objections.

4. This request is made in good faith and is not intended to delay the proceedings in this matter.

WHEREFORE, Defendant requests until September 23, 2022, respond to Plaintiff's Complaint.

Respectfully submitted,

Date: July 26, 2022

PEÑA & BROMBERG, PLC

By: /s/ Jonathan Peña *

JONATHAN PEÑA

*Authorized by email on July 26, 2022

Attorneys for Plaintiff

Date: July 26, 2022

PHILIP A. TALBERT

United States Attorney

Eastern District of California

By: /s/ Oscar Gonzalez de Llano

OSCAR GONZALEZ de LLANO

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to parties' stipulation (ECF No. 11), IT IS ORDERED that Defendant shall have until September 23, 2022, to file the certified administrative record or otherwise respond to the complaint. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: July 26, 2022

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE